

105.013

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KEYSTONE INSURANCE COMPANY  
AS SUBROGEE OF BRENDA BOYD

Plaintiffs

vs.

NATIONAL RAILROAD PASSENGER  
CORPORATION A/K/A AMTRAK, AND  
KEVIN CONNORS

Defendants/Third Party Plaintiffs

vs.

LYNN REDMOND AND LESLIE BOYD,  
JR.

Third Party Defendants

CIVIL ACTION

NO. 1:07-cv-00196 GMS

JURY TRIAL DEMANDED  
12 JURORS REQUESTED

**REQUEST TO ENTER DEFAULT JUDGMENT  
AGAINST THIRD PARTY DEFENDANTS**

To the Clerk of the above-named Court:

Please enter upon the docket the default of the Third Party Defendant, Lynn Redmond and Third-Party Defendant, Leslie Boyd, Jr., in the above action for failure to plead or otherwise defend as provided by the rules of federal procedure.

GALLAGHER & ROWAN, P.C.

By: /s/ Jessica E. Gensler Lippy  
JESSICA E. GENSLER LIPPY, ESQUIRE  
Attorney I.D. No. 4426  
Silerside Carr Executive Center  
501 Silerside Road, Suite 94  
Wilmington, DE 19809  
(302) 798-2779

Attorneys for Defendant/Third Party Plaintiffs  
National Railroad Passenger Corporation  
a/k/a Amtrak and Kevin Connors

Dated: September 25, 2007

105.013

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KEYSTONE INSURANCE COMPANY  
AS SUBROGEE OF BRENDA BOYD

Plaintiffs

vs.

NATIONAL RAILROAD PASSENGER  
CORPORATION A/K/A AMTRAK, AND  
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LYNN REDMOND AND LESLIE BOYD,  
JR.

Third Party Defendants

CIVIL ACTION

NO. 1:07-cv-00196 GMS

JURY TRIAL DEMANDED  
12 JURORS REQUESTED

**ATTORNEY CERTIFICATION IN SUPPORT  
OF REQUEST TO ENTER DEFAULT JUDGMENT**

1. I, Jessica E. Gensler Lippy, Esquire, am the attorney for the Defendants/Third Party Plaintiffs in the above-entitled action. I am fully familiar with the matters set forth herein. I make this Certification in support of the Defendants/Third Party Plaintiffs' request for entry of default against the Third Party Defendants Lynn Redmond and Leslie Boyd, Jr.

2. The Third Party Summons and Third Party Complaint in this action were served upon the Third Party Defendant Lynn Redmond via process server, Timothy A. Grant, on April 19, 2007. A copy of the Affidavit of Service is attached hereto and marked Exhibit "A".

3. The Third Party Summons and Third Party Complaint in this action were served upon the Third Party Defendant Leslie Boyd, Jr. via process server, Timothy A. Grant, on April 24, 2007. A copy of the Affidavit of Service is attached hereto and marked Exhibit "B".

4. The time within which Third Party Defendants may answer or otherwise move as to the Third Party Complaint has expired and has not been extended.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

GALLAGHER & ROWAN, P.C.

By /s/ Jessica E. Gensler Lippy  
JESSICA E. GENSLER LIPPY, ESQUIRE  
Attorney I.D. No. 4426  
Silerside Carr Executive Center  
501 Silerside Road, Suite 94  
Wilmington, DE 19809  
(302) 798-2779

Attorneys for Defendant/Third Party Plaintiffs  
National Railroad Passenger Corporation  
a/k/a Amtrak and Kevin Connors

Dated: September 25, 2007

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

KEYSTONE INSURANCE COMPANY  
AS SUBROGEE OF BRENDA BOYD

Plaintiffs

vs.

NATIONAL RAILROAD PASSENGER  
CORPORATION A/K/A AMTRAK, AND  
KEVIN CONNORS

Defendants/Third Party Plaintiffs

vs.

LYNN REDMOND AND LESLIE BOYD,  
JR.

Third Party Defendants

CIVIL ACTION

NO. 1:07-cv-00196 GMS

JURY TRIAL DEMANDED  
12 JURORS REQUESTED

**CERTIFICATE OF SERVICE**

I, Jessica E. Gensler Lippy, Esquire, attorney for Defendants, National Railroad Passenger Corporation a/k/a Amtrak and Kevin Connors, hereby certify that a true and correct copy of the foregoing Request to Enter Default Against Third Party Defendants, was served via first class mail, postage prepaid to the following:

William J. Cattie, III  
Rawle & Henderson, LLP  
300 Delaware Avenue  
Suite 1015  
PO Box 588  
Wilmington, DE 19899-0588  
(Counsel for Plaintiff)

Leslie Boyd, Jr.  
610 West Diamond Street  
Hazelton, PA 18201

Lynn Redmond  
15 S. Broom Street  
Wilmington, DE 19805

GALLAGHER & ROWAN, P.C.

By: /s/ Jessica E. Gensler Lippy  
JESSICA E. GENSLER LIPPY, ESQUIRE  
Attorney I.D. No. 4426  
Silerside Carr Executive Center  
501 Silerside Road, Suite 94  
Wilmington, DE 19809  
(302) 798-2779

Attorneys for Defendant/Third Party Plaintiffs  
National Railroad Passenger Corporation  
a/k/a Amtrak and Kevin Connors

Dated: September 25, 2007

## UNITED STATES DISTRICT COURT

District of

Delaware

PLAINTIFF KEYSTONE INSURANCE COMPANY  
 ASSUBROGEE OF BRENDA BOYD

THIRD PARTY SUMMONS IN A  
CIVIL ACTION

V. DEFENDANT AND THIRD PARTY PLAINTIFF  
 NATIONAL RAILROAD PASSENGER  
 CORPORATION AKA AMTRAK &  
 KEVIN CONNORS

Case Number: 1:07-cv-00196

V. THIRD PARTY DEFENDANT  
 LYNN REDMOND &  
 LESLIE BOYD, JR.

To: Name and address of Third Party Defendant

LYNN REDMOND  
 15 S. BROOM ST  
 WILMINGTON, DE 19805

YOU ARE HEREBY SUMMONED and required to serve on

PLAINTIFF'S ATTORNEY (name and address)

WILLIAM J. CATTIE, III  
 PAULES HENDERSON, LLP  
 360 DELAWARE AVE  
 STE 1015  
 PO BOX 588  
 WILMINGTON, DE 19899-0588

DEFENDANT AND THIRD-PARTY PLAINTIFF'S ATTORNEY

(name and address)

JESSICA E. LIPPY  
 GALLAGHER & ROWAN, P.C.  
 SILVERSIDE CARR EXECUTIVE CENTER  
 501 SILVERSIDE RD  
 STE 94  
 WILMINGTON, DE 19809

an answer to the third-party complaint which is served on you with this summons, within 20 days after the service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default may be taken against you for the relief demanded in the third-party complaint. There is also served on you with this summons a copy of the complaint of the plaintiff. You have the option of answering or not answering the plaintiff's complaint, *unless* (1) this is a case within Rule 9(h) Federal Rules of Civil Procedure, *and* (2) the third-party plaintiff is demanding judgment against you in favor of the original plaintiff under the circumstances described in Rule 14(c) Federal Rules of Civil Procedure, in which situation you are required to make your defenses, if any, to the claim of plaintiff as well as to the claim of the third-party plaintiff. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

CLERK

DATE

(By) DEPUTY CLERK

**RETURN OF SERVICE**

Service of the Summons and complaint was made by me <sup>(1)</sup>	DATE 4/19/07
NAME OF SERVER TIMOTHY A. GRANT	TITLE INVESTIGATOR

Check one box below to indicate appropriate method of service

- ☒ Served personally upon the third-party defendant. Place where served: 195. Broom ST Wilmington DE  
HAND DELIVERY TO ADRIAN BOYD; IYAN REDMOND'S SON; WHO WAS OVER THE  
AGE OF 18 & A RESIDENT OF THE HOME
- ☐ Left copies thereof at the third-party defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person with whom the summons and complaint were left: \_\_\_\_\_

- ☐ Returned unexecuted: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

- ☐ Other (specify): \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

**STATEMENT OF SERVICE FEES**

TRAVEL	SERVICES	TOTAL
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**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on

4/19/07  
Date

Signature of Server

Timothy A. Grant

P.O. Box 486

YARDEY, PA 19067  
Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

## UNITED STATES DISTRICT COURT

District of

Delaware

PLAINTIFF KEYSTONE INSURANCE COMPANY  
ASSUBROGEE OF BRENDA BOYD

THIRD PARTY SUMMONS IN A  
CIVIL ACTION

V. DEFENDANT AND THIRD PARTY PLAINTIFF

NATIONAL RAILROAD PASSENGER  
CORPORATION ALIA AMTRAK  
KEVIN CONNORS

Case Number: 1:07-cv-00196

V. THIRD PARTY DEFENDANT

LYNN REDMOND &amp; LESLIE BOYD, JR.

To: Name and address of Third Party Defendant

LESLIE BOYD, JR.  
~~1010 W. DIAMOND STREET~~ 345 WINTERS ST.  
~~HAZELTON, PA 18201~~ W. HAZELTON, PA.

YOU ARE HEREBY SUMMONED and required to serve on

PLAINTIFF'S ATTORNEY (name and address)

WILLIAM J. CATTIE, III  
RAWLE & HENDERSON, LLP  
300 DELAWARE AVE  
STE 1015  
PO BOX 588  
WILMINGTON DE 19899-0588

DEFENDANT AND THIRD-PARTY PLAINTIFF'S ATTORNEY  
(name and address)

JESSICA E. LIPPY  
GALLAGHER & ROWAN, P.C.  
SILVERSIDE CARR EXECUTIVE CENTER  
501 SILVERSIDE ROAD  
SUITE 94  
WILMINGTON, DE 19809

an answer to the third-party complaint which is served on you with this summons, within 20 days after the service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default may be taken against you for the relief demanded in the third-party complaint. There is also served on you with this summons a copy of the complaint of the plaintiff. You have the option of answering or not answering the plaintiff's complaint, *unless* (1) this is a case within Rule 9(h) Federal Rules of Civil Procedure, *and* (2) the third-party plaintiff is demanding judgment against you in favor of the original plaintiff under the circumstances described in Rule 14(c) Federal Rules of Civil Procedure, in which situation you are required to make your defenses, if any, to the claim of plaintiff as well as to the claim of the third-party plaintiff. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

CLERK

DATE

(By) DEPUTY CLERK



## RETURN OF SERVICE

Service of the Summons and complaint was made by me <sup>(1)</sup>	DATE 4/24/07
NAME OF SERVER TIMOTHY A. GRANT	TITLE INVESTIGATOR

Check one box below to indicate appropriate method of service

☒ Served personally upon the third-party defendant. Place where served: 395 WINTERS ST (new address), W. HAZELTON, PA. HAND DELIVERY TO MR. BOYD WIFE:

☐ Left copies thereof at the third-party defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person with whom the summons and complaint were left: \_\_\_\_\_

☐ Returned unexecuted: \_\_\_\_\_

☐ Other (specify): \_\_\_\_\_

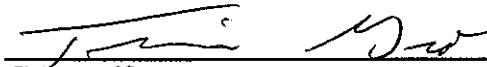
## STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL
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## DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on 4/24/07  
Date

  
Signature of Server  
P.O. BOX 486  
YARDLEY, PA 19067  
Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.